

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

SYNOPSISYS, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:21-cv-00252
)	
RISK BASED SECURITY, INC.,)	
)	
Defendant.)	
)	

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE
REPLY BRIEF IN SUPPORT OF SYNOPSISYS, INC.’S
RENEWED MOTION FOR FEES AND COSTS**

Plaintiff Synopsisys, Inc. (“Synopsisys”), by and through its undersigned counsel, pursuant to Local Rule 7(1)(I), and with consent of Defendant Risk Based Security, Inc. (“RBS”), respectfully requests that the Court grant an eight-day extension to the deadline for Synopsisys to file a reply in support of its Renewed Motion for Fees and Costs. In support of this Consent Motion, Synopsisys states as follows:

1. On July 28, 2023, Synopsisys filed its Renewed Motion for Fees and Costs. (ECF No. 445).
2. On August 9, 2023, the Court granted RBS’s motion to bifurcate consideration of Synopsisys’ Motion for Fees and Costs. (ECF No. 449). The Court did not alter the related briefing schedule. Per Local Rule 7(1)(F), the due date for RBS’s response was August 11, 2023, and the due date for Synopsisys’ reply was August 17, 2023.

3. Following the Court's Order granting bifurcation, RBS sought Synopsys' consent to extend the deadline for its response by two weeks, until August 25, 2023. RBS similarly offered to extend the deadline for Synopsys to file its reply by two weeks, until September 14, 2023. Synopsys agreed.

4. On August 10, 2023, RBS filed a consent motion seeking the agreed-upon extensions to the briefing schedule. (ECF No. 451).

5. The Court granted RBS' consent motion in part, permitting RBS to file its response on or before August 25, 2023, and denying without prejudice RBS' request to extend Synopsys' deadline for reply. (ECF No. 451). The Court further instructed that Synopsys "may move for an extension of time to file its reply brief if it needs additional time," provided that Synopsys "explain the reasons for its requests[.]" (*Id.*)

6. In light of the Court's approved extension for RBS, the six-day window for filing Synopsys' reply now falls during a period when multiple attorneys slated to draft Synopsys' brief will be out of the office, including on international travel. These individuals were heavily involved in researching and drafting Synopsys' original fee petition, and they are best poised to draft the related reply—particularly under tight timing constraints—because of the knowledge and context they already possess. An eight-day extension of Synopsys' briefing deadline will permit these individuals to work on the reply as planned.

7. RBS has consented to the relief requested herein.

8. Synopsys' request for an extension is timely given that it was filed before Synopsys' scheduled briefing deadline of August 31, 2023. *See* Fed. R. Civ. P. 6(b)(2)(A) ("When an act may or must be done within a specified time, the court may, for good cause, extend the time . . . if a request is made, before the original time or its extension expires[.]").

9. A short extension of the briefing schedule will not unduly delay proceedings or otherwise prejudice the parties or the Court given that no hearing has been set on Synopsys' fee motion and no other pending deadlines remain in this case.

WHEREFORE, Synopsys respectfully requests that the Court grant this Consent Motion and enter an Order extending Synopsys' deadline to file a reply in support of its Renewed Motion for Fees and Costs until September 8, 2023.

Dated: August 17, 2023

Respectfully submitted,

/s/ N. Thomas Connally

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